

EXHIBIT A

MONTGOMERY, McCRACKEN, WALKER & RHODES, LLP
ATTORNEYS AT LAW

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ADMITTED IN PENNSYLVANIA & NEW JERSEY

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October 3, 2003

VIA FACSIMILE

Honorable Cynthia M. Rufe
United States District Court
for the Eastern District of PA
2609 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1797

Re: Jason Roman v. City of Reading and Reading Police Department
U.S.D.C. for the E.D. of Pa., No. 02-4763

Dear Judge Rufe:

In response to the Court's Order dated September 22, 2003, this letter will serve as Defendants' status letter. Please be advised that Mr. Roman has not been in contact with this office since the Court's previous order dated April 21, 2003, which granted in part and denied in part Defendants' motion to dismiss.

Defendants intend to serve written discovery requests on Mr. Roman next week regarding Mr. Roman's remaining equal protection and intra-state travel claims. In addition, Defendants will depose Mr. Roman within the next 2-3 weeks.

Defendants respectfully request that the Court issue a revised scheduling order extending the discovery deadline to November 28, 2003, and the summary judgment deadline to December 19, 2003. Counsel for defendants will be available for a conference call to discuss a revision to the scheduling order.

Respectfully,



Danielle M. White

cc: Jason Roman (via certified mail)

EXHIBIT B

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October 10, 2003

VIA CERTIFIED MAIL

Jason Roman
911 Varnsdale Road
Allentown, PA 18103

Re: *Roman v. City of Reading and Reading Police Department*
USC EDPA No. 02-CV-4763

Dear Mr. Roman:

I hereby serve you with the following:

- (1) Disclosures By Defendants City of Reading And Reading Police Department Pursuant to Fed. R. Civ. P. 26(A)(1);
- (2) Defendants' First Set of Interrogatories Directed to Plaintiff Jason Roman;
- (3) Defendants' First Set of Requests For Production of Documents Directed to Plaintiff Jason Roman; and
- (4) Notice of Deposition for Plaintiff Jason Roman.

Please note that the Federal Rules of Civil Procedure require all parties to make initial disclosures that provide: (1) the name and address of each individual likely to have information regarding that parties claims or defenses; (2) a copy of or a description of all documents that the party may use to support his claims or defenses; (3) a computation of damages; and (4) a copy or description of any insurance agreement. Kindly provide plaintiff's disclosures in conjunction with the discovery responses.

Please also note that the Federal Rules of Civil Procedure require that responses to Interrogatories and Requests for Production of Documents be served within 30 days of receipt.

MONTGOMERY, McCracken, Walker & Rhoads, LLP

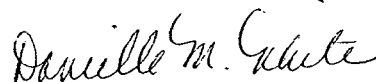
Jason Roman

October 10, 2003

Page 2

If you have any questions about the enclosed documents, the request for plaintiff's initial disclosures, or about the deposition scheduled for November 3, 2003 at 10 a.m., please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Danielle M. White".

Danielle M. White

DMW
Enclosures

EXHIBIT C

MONTGOMERY, McCracken, Walker & Rhoads, LLP
ATTORNEYS AT LAW

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October 21, 2003

VIA CERTIFIED MAIL

Jason Roman
911 Varnsdale Road
Allentown, PA 18103

Re: *Roman v. City of Reading and Reading Police Department*
USC EDPA No. 02-CV-4763

Dear Mr. Roman:

I am enclosing an Amended Notice of Deposition. Please note that the deposition is now scheduled for Tuesday, November 4, 2003 at 10 a.m.

Please do not hesitate to contact this office if you have any questions.

Sincerely,



Danielle M. White

DMW

Enclosure

cc: David J. MacMain, Esquire
Eileen Binderman, Paralegal

EXHIBIT D

November 3, 2003

David J. MacMain, Esquire
Danielle M. White, Esquire
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Philadelphia, PA 19109

BY FAX AND BY REGULAR MAIL

Re: Roman vs. Reading
Federal Court No. 02-CV-4763

Dear Counsel:

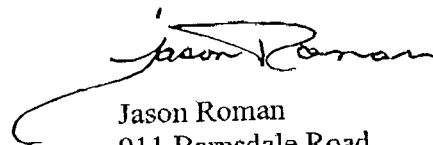
For the past several months, I have been under doctors' care and I have been confused lately as to my times and dates. I have consulted with Attorney W. Thomas Anthony, who has agreed to represent me in this matter.

I want to apologize for the misunderstanding I had with respect to the deposition scheduled for today's date. I was of the impression that the deposition was to be taken on December 3. Attorney Anthony informed me that he would be sending you a letter letting you know that he would be representing me in the future.

Once again, I am terribly sorry for the confusion and the delay. I have instructed Mr. Anthony to contact your office and arrange for a new time and date for my deposition to be taken.

Thank you very much for your time, and of course, for your understanding.

Sincerely yours,

A handwritten signature in black ink that reads "Jason Roman". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Jason Roman
911 Barnsdale Road
Allentown, PA 18103
(610) 821-0248

cc: W. Thomas Anthony, Esq.
J. R.

EXHIBIT E

November 3, 2003

David J. MacMain, Esquire
Danielle M. White, Esquire
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Philadelphia, PA 19109

BY FAX AND BY REGULAR MAIL

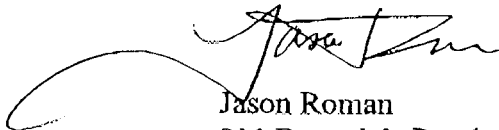
Re: Roman vs. Reading
Federal Court No. 02-CV-4763
Cancellation of deposition.

Dear Ms. Danielle White,

I am really confused, I have a letter here from you saying that the deposition is scheduled for November 4, 2003 at 10:00 am. As I pointed out to Mr. MacMain, I am completely confused. I am informing you that I will not be able to keep this date because of prior commitments and because Attorney W. Thomas Anthony cannot be available at that time. Sometime today he will be calling your office to reschedule the deposition.

I sincerely appreciate your patience with me in this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jason Roman", with a long, sweeping horizontal line extending to the left.

Jason Roman
911 Barnsdale Road
Allentown, PA 18103
(610) 821-0248

cc: W. Thomas Anthony, Esq.
J. R.

EXHIBIT F

MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP
ATTORNEYS AT LAW

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November 4, 2003

VIA CERTIFIED AND REGULAR MAIL

Jason Roman
911 Varnsdale Road
Allentown, PA 18103

Re: *Roman v. City of Reading and Reading Police Department*
USC EDPA No. 02-CV-4763

Dear Mr. Roman:

I have assumed the handling of this matter from Danielle White. Please direct all future correspondence to me as well as to David MacMain.

We were obviously disappointed that you did not appear for your scheduled deposition this morning. Since this deposition was scheduled weeks in advance, I do not understand why you were unable to notify us that you would not be attending until the evening before the deposition. As for Mr. Anthony, he has not yet contacted us or entered his appearance on your behalf. Please ask him to contact me as soon as possible.

In the meantime, we have rescheduled your deposition for Monday, November 17, 2003, beginning at 10:00 a.m. at our office, and I am enclosing a Second Amended Notice of Deposition to that effect. Please provide it to Mr. Anthony if he will be representing you. If you fail to appear for your deposition again, we will seek appropriate relief from the Court, including dismissal of this action.

Sincerely,



Janelle E. Fulton

JEF/bms

Enclosure

cc: David J. MacMain, Esquire
Eileen Binderman, Paralegal

EXHIBIT G

MONTGOMERY, McCracken, Walker & Rhoads, LLP
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FAX 610-889-2220

November 11, 2003

BY FACSIMILE ONLY

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: Roman v. City of Reading and Reading Police Department
USDC EDPA No. 02-CV-4763

Dear Mr. Anthony:

Per our telephone conversation, attached is a copy of the Second Amended Notice of Deposition rescheduling your client's deposition for Monday, November 17, 2003, beginning at 10:00 a.m. at our office. I served the original of this Notice on your client by letter dated November 4, 2003.

In addition, please note that we served the following on your client on October 10, 2003:

- (1) Disclosures by Defendants City of Reading and Reading Police Department Pursuant to Fed. R. Civ. P. 26(A)(1);
- (2) Defendants' First Set of Interrogatories Directed to Plaintiff Jason Roman; and
- (3) Defendants' First Set of Requests for Production of Documents Directed to Plaintiff Jason Roman.

MONTGOMERY, McCracken, Walker & Rhoads, LLP

W. Thomas Anthony, Esquire
November 11, 2003
Page 2

The answers to the written discovery are now due. If Mr. Roman has not provided you with these materials, or if he is unable to do so, and you would like me to send you a copy, let me know.

Finally, please send me a copy of your entry of appearance on behalf of Mr. Roman at your earliest convenience.

Sincerely,



Janelle E. Fulton

JEF:bms
Enclosure

cc: David J. MacMain, Esquire (w/o enclosure)

EXHIBIT H

MONTGOMERY, McCracken, WALKER & RHOADS, LLP
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November 17, 2003

BY FACSIMILE AND REGULAR MAIL

W. Thomas Anthony, Esquire
451 Main Street
Bethlehem, PA 18018

Re: *Roman v. City of Reading and Reading Police Department*
USDC EDPA No. 02-CV-4763

Dear Mr. Anthony:

This will confirm that, on Friday, November 14, you advised my secretary that you were unable to attend your client's deposition on Monday, November 17, but that you are available on December 3 at 11:00 a.m. Accordingly, enclosed is a Third Amended Notice of Deposition rescheduling Mr. Roman's deposition for Wednesday, December 3 at 11:00 a.m. in our office.

In addition, your client's initial disclosures and his answers to Defendants' written discovery are now overdue. Please provide these within ten (10) days so we are not forced to burden the Court with a discovery motion.

Sincerely,



Janelle E. Fulton

JEF:bms

Enclosure

cc: David J. MacMain, Esquire (w/o enclosure)